

DECLARATION OF JAY K. LAWRENCE

I, Jay K. Lawrence, declare:

1. I am over the age of eighteen (18). Unless otherwise indicated, I have personal knowledge of the matters set forth in this declaration, and I am competent to testify to the following.

2. I am the Manager of Product Analysis for The Goodyear Tire & Rubber Company (“Goodyear”). Since 1976, I have been employed by Goodyear in various capacities involving tire technology, including among many others, the design and developmental testing of tires. Of particular note, from 1999 to 2002, I was the lead engineer in the Passenger and Radial Light Truck Tire Development Teams for Original Equipment Manufacturer tires, and from 2002 through 2007, I was the team leader in the Radial Light Truck Replacement Tire Development Organization.

3. By virtue of my tenure with Goodyear, I am generally familiar with Goodyear’s United States business operations, its relationship with company-owned and authorized retailers that sell Goodyear tires, and the location of Goodyear’s businesses, including its manufacturing facilities. I am also able to track tires to their point of origin, using its DOT number.

4. I understand that this Declaration is offered in support of Goodyear’s motion to transfer the action captioned as *Susman, et al. v. Goodyear Tire & Rubber Company, et al.* from the United States District Court for the Eastern District of Pennsylvania to the United States District Court for the District of Nebraska.

5. I was informed by counsel that plaintiffs have identified a tire bearing the DOT number "MDORNJHV0244." However, I was also informed by counsel that the tire at issue may actually bear DOT number "MDORNJHV244."

6. I identified the tire at issue using the second DOT number recited in Paragraph 6, above. Upon information and belief, that tire was designed by The Goodyear Tire & Rubber Company in Akron, Ohio and manufactured by The Goodyear Tire & Rubber Company in Gadsen, Alabama.

I declare under penalty of perjury that the foregoing is true and correct. This declaration was executed on August 1, 2017, in Akron, Ohio.


Jay K. Lawrence